

ORIGINAL

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1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE DISTRICT OF MARYLAND
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5 MELVIN NEWSOME, et al., :

6 Plaintiffs :

7 Vs. : CASE NO. S01-2257

8 UP-TO-DATE LAUNDRY, INC., :

9 Et al., :

10 Defendants :

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12 Deposition of LINDA MARR, taken on
13 Tuesday, March 11, 2003, at 1:23 p.m., at the law
14 offices of Kathleen Cahill, 15 East Chesapeake
15 Avenue, Towson, Maryland, before Ilana E.
16 Johnston, R.P.R. and Notary Public.

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20 Reported by:

21 Ilana E. Johnston, R.P.R.

CRC-SALOMON
Baltimore, Maryland
Phone (410) 821-4888 Fax (410) 821-4889

1 Q. Did you ever see or hear Brad Minetree
2 use any derogatory racial slurs to black
3 employees?

4 A. I believe so.

5 Q. And do you remember exactly which
6 derogatory slurs you've seen or heard and when
7 this happened?

8 A. When, not really. Exactly he would
9 refer to them as niggers. Some of the women were
10 sluts. That's pretty much, I think, what I can
11 recall.

12 Q. Did you ever hear him say anything
13 beyond just calling the black workers niggers?
14 Did he ever call them, for example, dumb niggers
15 or stupid niggers or fucking niggers, things like
16 that?

17 A. All of that.

18 Q. Okay. Did you ever hear him refer to
19 any black workers as Kunta Kinte or Bubba,
20 anything like that?

21 A. That's possible. I don't remember

1 you know, please don't say this.

2 Q. Did employees ever complain to you about
3 Brad Minetree's use of these words or his other
4 derogatory racial slurs?

5 A. I can't think that they specifically
6 complained about that.

7 Q. Did Amy Mattis ever talk to you about
8 Brad's use of these racial slurs?

9 A. It's possible.

10 Q. Do you have any recollection of any
11 remarks that she told you about those words or
12 his use of those words?

13 A. I know that Amy and I talked about Brad
14 and his behavior, but I can't recall a specific
15 conversation.

16 Q. What was Brad's response when you told
17 him that he shouldn't use these derogatory racial
18 slurs?

19 A. He tried to laugh it off, you know, like
20 what I was saying was funny and that I was being
21 funny.

1 management's response to your efforts to talk to
2 them or counsel them about this type of behavior?

3 A. How would I characterize management's
4 response?

5 Q. Overall.

6 A. Overall? I guess I like dismissive.
7 That's probably a good word to describe it. They
8 didn't take it seriously.

9 Q. You were saying at the end before we
10 took the break that you couldn't climb the
11 mountain. So did you think that your efforts to
12 correct or call this type of inappropriate
13 behavior to their attention, do you think your
14 efforts were futile?

15 MS. PHELAN: Objection to the form
16 of the question.

17 MS. GRDINA: You can answer.

18 A. I felt that my efforts were futile.

19 Q. Now, did you ever receive any written
20 criticism of your work from Tom Hendrickson or
21 anybody else?

1 Q. Uh-huh.

2 A. The best I'm thinking, it was -- his
3 name was John.

4 Q. John Thomas?

5 A. Okay. Yes.

6 Q. Okay. Do you remember any other
7 occasions where comments comparing blacks',
8 whites' and Hispanics' either work qualities or
9 abilities were made in staff meetings?

10 A. Not at the moment.

11 Q. Do you have any substantive knowledge
12 whether there's any basis, in fact, for the
13 statement that the quality of the white workers'
14 work was better than that of the Hispanics and
15 that of the Hispanics was better than the blacks?

16 A. Can you say that again?

17 Q. Do you have any knowledge whether there
18 is any, I guess, factual basis for the comment
19 that the work of the whites was better than the
20 work of the Hispanics or that the work of the
21 Hispanics was better than the blacks?

1 A. The only knowledge that I have of that
2 point is that Nancy told me that's the way it
3 is. I remember that distinctly. She said that
4 that is just the way it is.

5 Q. Okay. Did you ever make any
6 investigation in the plant where either quantity
7 or quality-wise that was actually true?

8 A. No.

9 Q. Okay. You indicated, I believe, that
10 absenteeism was a problem in the plant?

11 A. Uh-huh.

12 MS. GRDINA: Objection. I don't
13 think she said that.

14 Q. Tell me about that.

15 A. Tell you about absenteeism in the plant?

16 Q. What was the problem?

17 A. I think it was a variety of things.

18 I'm not sure how to answer that. I mean, you
19 have absenteeism in any business. I don't know
20 how to answer it.

21 Q. Well, let's start with the first part,